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November 21, 2019

**VIA ECF**

The Honorable James L. Cott, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1360  
United States Courthouse  
New York, NY 10007

**Re: Seo v. I.P.T. Name and Design Inc. et al.**  
**Civil Action No: 1:19-cv-02202-ALC-JLC**  
***First Adjournment Request of Rule 16 Conference***  
***Presently Scheduled for November 26, 2019***

Dear Judge Cott:

We represent the Plaintiff, Hyuk Jin Seo in the above-referenced wage-and-hour action. Pursuant to Rule (I)(F) of Your Honor's Individual Practices, we write jointly with Defense Counsel to request an adjournment, *sine die*, of the Rule 16 Conference presently scheduled before Your Honor on November 26, 2019 at 11:00 a.m. (Dkt. 26). This is the first request by the parties and will not affect any other deadlines.

The reason for this request is that the parties wish to continue with mediation. The parties began a mediation session on June 9, 2019. Thereafter, the parties adjourned the mediation session to exchange further discovery and damage calculations. The mediation session was ultimately rescheduled for October 17, 2019. Unfortunately, there was an issue wherein the parties were communicating with each other without the knowledge of counsel. The parties addressed and resolved the issues with the assistance of the Honorable Andrew L. Carter, Jr. on November 14, 2019. (see Dkts. 18-25).

Upon adjournment, the Parties will contact the Mediation Office and Mediator Ms. James to expeditiously schedule a continued mediation date. We thank Your Honor in advance for Your Honor's time and attention to this request.

Very truly yours,

/s/ Farzad Ramin  
Farzad Ramin

cc: (All Counsel of Record via ECF)